

## STATEMENT OF BASIS

Tiffin Motorhomes, Inc.  
Red Bay, Alabama  
Franklin County  
Facility Number 704-0013

On December 5, 2006, a Synthetic Minor Operating Permit was issued to Tiffin Motor Homes. On December 3, 2007, Tiffin reported to the Department that it had exceeded the volatile organic compound limits of the Synthetic Minor Operating Permit. On March 20, 2008, an Air Permit was issued to Tiffin Motorhomes. On June 18, 2008, a consent order was issued to Tiffin for exceeding the SMOP limits. On July 2, 2008, the Department received an application from Tiffin for a Major Source Operating Permit.

This proposed Title V Major Source Operating Permit will be issued under the provisions of ADEM Admin. Code R. 335-3-16. The above named applicant has requested authorization to perform the work or operate the facility shown on the application and drawings, plans and other documents attached hereto or on file with the Air Division of the Alabama Department of Environmental Management, in accordance with the terms and conditions of this permit. Tiffin manufactures motor homes, and has a standard industrial classification of 3716. Based on the Title V permit application, this facility is a potential major source for volatile organic compounds, hazardous air pollutants, and particulate matter.

The units for this facility are:

- 001 Cyclones WW-1 and WW-2 (wood cutting and sanding twin cyclone)
- 002 Cyclone WW-3 (styrofoam cyclone)
- 003 Baghouse WW-5 (main bag filter)
- 005 Booth SB-10 (acrylic cutting and sanding)
- 006 Booth SB-11 (acrylic cutting and sanding)
- 007 Booth SB-12 (acrylic cutting and sanding)
- 008 Booth SB-13 (acrylic cutting and sanding)
- 009 Weld Shop Paint Booth
- 010 Vent DA-1 (door glue hood)
- 011 Booth RD-1 (research and development booth)
- 012 Vent WH-1 (warehouse booth)
- 013 Booth SB-27 (minor repair painting)
- 014 Booth SB-14 (wood finishing booth)
- 015 Booth SB-15 (wood finishing booth)
- 016 Booth SB-16 (wood finishing booth)
- 017 Booth SB-17 (wood finishing booth)
- 018 Booth SB-18 (wood finishing booth)
- 019 Booth SB-19 (wood finishing booth)
- 020 Booth SB-20 (wood finishing booth)
- 021 Booth SB-21 (wood finishing booth)
- 022 Booth SB-22 (wood finishing booth)
- 023 Booth SB-23 (wood finishing booth)
- 024 Booth SB-24 (wood finishing booth)
- 025 Booth SB-25 (wood finishing booth)

**Cyclones WW-1, WW-2, WW-3, WW-5, and SB-10 through SB-13**

When wood, aluminum, and styrofoam components of the motor homes are cut and sanded. The particles from these processes are collected by a vacuum system. Cyclones collect the particulate matter.

### **Emissions Standards**

#### **Opacity**

These units shall not discharge into the atmosphere opacity greater than twenty percent (20%), as determined by a six (6) minute average. During one six (6) minute period during any sixty (60) minute period, this unit may discharge opacity not exceeding forty (40%) percent.

#### **Particulate Matter**

These units shall not discharge into the atmosphere particulate matter in any one hour in excess of  $E = 3.59 (P^{0.62})$  where P is the process weight in tons per hour, and E is the emissions in pounds per hour.

ADEM Admin. Code R. 335-3-4-.01

ADEM Admin. Code R. 335-3-4-.04

### **Expected Emissions**

Particulate emissions from these units are estimated to be less than 250 tons per year.

### **Periodic Monitoring**

Visible emissions shall be monitored daily while the unit is operating, by someone familiar with Method 9 of 40 CFR 60 Appendix A. If visible emissions above normal are observed, corrective action shall be taken within 24 hours, and an additional visual observation shall be performed. A log book of the visible observations required in proviso 4.1 shall be retained for at least five years and available for inspection upon request. This log book should also include the nature and date of any maintenance actions taken to correct excess opacity episodes.

Units WW-1-2, and WW-5 are required to meet the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, because the uncontrolled emissions from each unit are greater than 100 Tons Per Year. The controlled emissions from each of these units are expected to be less than 100 TPY. Daily monitoring of visible opacity will be sufficient because the controlled emissions from each unit are less than 100 tons per year. The indicator to be monitored is visible opacity. The means used to measure opacity is an observer familiar with Method 9 of 40 CFR 60 Appendix A. The performance criteria for the monitoring are specified in Method 9 of 40 CFR 60 Appendix A, and meet the requirements of 40 CFR 64.3(b). This facility is obligated to conduct the monitoring and record keeping required by this permit.

### **Paint Booths DA-1, RD-1, WH-1, SB-1 through SB-4, SB-14 through SB-25, and SB-27**

Steel angles are welded and bolted to truck chassis. The frames are then painted black in a paint booth with four emission points. Other booths are used for various coating and sanding work.

### **Emissions Standards**

Emissions of volatile organic compounds from all surface coating operations including, but not limited to coating, storage, cleanup, etc., shall not exceed 230 tons in any consecutive 12-month period based on the premise that all VOCs applied are emitted.

Emissions of hazardous air pollutants from all surface coating operations shall not exceed 24 tons in any 12-month period. Emissions of any single hazardous air pollutant shall not exceed 9 tons in any 12-month period.

**Expected Emissions**

Potential air emissions from these units are estimated to be 147 tons per year of volatile organic compounds, and 14 ton per year of hazardous air pollutants.

**Periodic Monitoring**

Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents that pertain to this air permit upon request. These records shall contain the following information:

1. The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.
2. The percent by weight of VOCs, water, solids, HAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
3. The percent by volume of VOCs, water, solids, HAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
4. Compliance with VOC and HAP limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC and HAP content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.
5. Complete inventories of the VOC and HAP containing materials (their usage, VOC content and HAP content) shall be made at the end of each calendar month.
6. The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons.
7. The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.

Within the first 10 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of the identification of the exceedance.

A report summarizing the reporting requirements shall be submitted each calendar quarter, in a format approved by the Department in advance.

**Recommendations**

I recommend issuing the attached Title V permit. The proposed monitoring is sufficient to demonstrate compliance with all applicable air regulations.

---

Hal Brock  
Industrial Chemicals Section  
Chemical Branch

Air Division  
December 15, 2009